



XP-UK privacy notice

XP-UK customer privacy notice

Registered name: Lions Bay Limited

This privacy notice tells you what to expect us to do with your personal information.

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Contact details

Email

info@xp-uk.org

What information we collect, use, and why

We collect or use the following information **for student education and welfare:**

- Names and contact details for students/children
- Names and contact details for carers



- Gender
- Date of birth
- Dietary requirements (including vegetarian, vegan, gluten free and halal requirements)
- Payment details and financial information including transactions
- Details of any criminal convictions
- Photographs
- Attendance and reason for absence data
- Progress reports
- Information relating to compliments and complaints

We collect or use the following personal information for **dealing with queries, complaints or claims**:

- Names and contact details
- Address
- Payment details

We collect or use the following information **for information updates or marketing purposes**:

- Names and contact details
- Address
- Marketing preferences
- Photographs
- Website and app user journey information
- Records of consent, where appropriate

We collect or use the following information **for recruitment purposes**:



- Contact details (eg name, address, telephone number or personal email address)
- Date of birth
- National Insurance number
- Copies of passports or other photo ID
- Right to work information
- Details of any criminal convictions (eg DBS, Access NI or Disclosure Scotland checks)

We also collect or use the following information **for recruitment purposes**:

- Racial or ethnic origin

We collect or use the following information **to comply with legal requirements**:

- Identification documents
- Criminal offence data (including Disclosure Barring Service (DBS), Access NI or Disclosure Scotland checks)

We also collect or use the following information **to comply with legal requirements**:

- Racial or ethnic origin

Lawful bases and data protection rights

Under UK data protection law, we must have a “lawful basis” for collecting and using your personal information. There is a list of possible lawful bases in the UK GDPR. You can find out more about lawful bases on the ICO’s website.

Which lawful basis we rely on may affect your data protection rights which are in brief set out below. You can find out more about your data



protection rights and the exemptions which may apply on the ICO's website:

- **Your right of access** - You have the right to ask us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for. [You can read more about this right here.](#)
- **Your right to rectification** - You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete. [You can read more about this right here.](#)
- **Your right to erasure** - You have the right to ask us to delete your personal information. [You can read more about this right here.](#)
- **Your right to restriction of processing** - You have the right to ask us to limit how we can use your personal information. [You can read more about this right here.](#)
- **Your right to object to processing** - You have the right to object to the processing of your personal data. [You can read more about this right here.](#)
- **Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you. [You can read more about this right here.](#)
- **Your right to withdraw consent** - When we use consent as our lawful basis you have the right to withdraw your consent at any time. [You can read more about this right here.](#)

If you make a request, we must respond to you without undue delay and in any event within one month.

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

Our lawful bases for the collection and use of your data

Our lawful bases for collecting or using personal information **for student education and welfare** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply,



except the right to object. To be clear, you do have the right to withdraw your consent at any time.

- Contract - we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legitimate interests – we’re collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - We gather and hold personal information with regards to student education and welfare in order to ensure that courses are completed to the benefit of the student and their parents and/or sponsor. This data is only held for the duration of the period of study. We may retain anonymised data to help the organisation improve programmes of study.

Our lawful bases for collecting or using personal information for **dealing with queries, complaints or claims** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract - we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legitimate interests – we’re collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - We request and hold personal information with regards to queries and complaints in order to ensure that such questions be dealt with in a speedy and efficient manner. This data is only held for such



purposes and would be removed after the successful conclusion of the matter at hand. We may retain anonymised data to help the organisation improve performance.

Our lawful bases for collecting or using personal information **for information updates or marketing purposes** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Legal obligation - we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

Our lawful bases for collecting or using personal information **for recruitment purposes** are:

Our lawful bases for collecting or using personal information **to comply with legal requirements** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Legal obligation - we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

Where we get personal information from

- Parents or carers



How long we keep information

Data Type	Retention Period	Responsible
Student Records	12 months from creation	DPO
Employment Records	2 years from creation unless still employed)	DPO
Financial Records	Current Year plus 6 years	DPO
Recruitment Records	1 year from creation	DPO
Legal and Compliance	No Limit	DPO
Marketing data - where identifiable personal data are involved	6 months after creation	DPO

Who we share information with

Others we share personal information with

- Parents and carers

How to complain

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice.

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113



Website: <https://www.ico.org.uk/make-a-complaint>

Last updated

2 December 2024